

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF PENNSYLVANIA  
PHILADELPHIA DIVISION**

In re:  Sadie B. Perez,  Debtors.  Wilmington Savings Fund Society, FSB, doing business as Christiana Trust, not in its individual capacity, but solely as trustee for BCAT 2015-14BTT,  Objecting Party  v.  Sadie B. Perez, Debtor and William C. Miller, Esq., Chapter 13 Trustee,  Respondents.	Bankruptcy Case#: 18-10107-elf  Chapter 13  Related to Doc. No. 22
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**OBJECTION TO CONFIRMATION OF DEBTOR'S CHAPTER 13 PLAN**

COMES NOW, Wilmington Savings Fund Society, FSB, doing business as Christiana Trust, not in its individual capacity, but solely as trustee for BCAT 2015-14BTT (hereinafter referred to as ("Movant")), who holds a secured lien on the Debtor's real property known as 6013 Walnut St Philadelphia, PA 19139, and files this Objection to Confirmation of Debtor's Plan.

Movant anticipate to file a proof of claim with pre-petition arrearage in the amount of \$21,621.93. The Debtor's Chapter 13 Plan lists a pre-petition arrearage owed to Movant of \$300.00. The arrears listed in the Plan do not match Movant's pre-petition arrearage amount. Accordingly, the Chapter 13 Plan fails to comply with the provisions of 11 U.S.C. § 1325(a).

WHEREFORE, Movant prays that this Court inquire into the matters raised herein and deny confirmation of the Chapter 13 Plan, or enter such orders that the Court deems just and proper.

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**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that on March 14, 2018, I electronically filed the foregoing with the Clerk of Court by using the CM/ECF system, and a true and correct copy has been served via CM/ECF or United States Mail to the following parties:

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